



**Baker & McKenzie LLP**

452 Fifth Avenue  
New York, NY 10018  
United States

Tel: +1 212 626 4100  
Fax: +1 212 310 1600  
www.bakermckenzie.com

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\* Associated Firm  
\*\* In cooperation with  
Trench, Rossi e Watanabe  
Advogados

March 3, 2021

**VIA ECF**

The Honorable Ronnie Abrams  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Ashland Global Holdings Inc. v. Valvoline, Inc., Case No. 21 cv. 498 (RA)**

Dear Judge Abrams,

We represent Defendant, Valvoline Inc., in the above-referenced matter. We write, with Plaintiff's consent, to request adjournments of the Initial Conference set for March 12, 2021, and the filing date of the parties' joint letter and proposed case management plan and scheduling order, both currently due March 5, 2021.

The parties request the adjournments in light of Defendant's motion to dismiss, filed on February 26, 2021 (Dkt. 15 and 16). The parties would appreciate the opportunity to brief the issues raised in this motion before participating in an initial status conference, entering into a case management plan, and commencing potentially unnecessary fact discovery. Accordingly, we would respectfully request adjournments of the Initial Conference and the related deadlines set forth in the Court's February 10, 2021 Order (Dkt. 13), pending resolution of Defendant's motion to dismiss.

Pursuant to your Honor's Individual Rules & Practices in Civil Cases, Defendant includes with this Letter Motion a Revised Order and Notice of Initial Conference. This is defendant's second request for an adjournment, the first one having been granted (Dkt. 13).

We thank the Court for its consideration of this matter.

Respectfully,

/s Daniel A. Rosen  
Daniel A. Rosen  
Partner

+1 212 626 4272  
daniel.rosen@bakermckenzie.com

cc: Plaintiff's counsel (by ECF)

Application granted. The initial  
pretrial conference is hereby  
adjourned *sine die*.

SO ORDERED.

Hon. Ronnie Abrams  
March 4, 2021